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*Attorneys for Defendant*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CHINA AUTO LOGISTICS, INC., a Nevada  
Corporation,

Plaintiff,

vs.

DLA PIPER, LLP, a Maryland Limited  
Liability Partnership,

Defendant.

Case No.: 2:20-cv-00646-GMN-EJY

**STIPULATION TO EXTEND  
(2<sup>nd</sup> REQUEST)**

**STIPULATION AND ORDER TO EXTEND TIME FOR RULE 26**

**Whereas** this action was filed by Plaintiff China Auto Logistics against Defendant DLA Piper LLP (US) in Clark County District Court, State of Nevada, on March 13, 2020.

**Whereas** Defendant DLA Piper LLP (US) filed a notice of removal removing this action to this court on April 6, 2020.

**Whereas** Defendant DLA Piper LLP (US) filed a motion to dismiss on April 13, 2020 in which it challenges personal jurisdiction over it Nevada courts.

**Whereas** on May 6, 2020 the parties entered into a stipulation and order to extend the time for holding a Rule 26(f) conference [DOC No. 14].

1           **Whereas** the Court issued the Order to extend time for holding a Rule 26 (f) conference  
2 [DOC No. 16], which expires June 30, 2020.

3           Whereas the parties believe continuing good cause exists to extend the time for holding a  
4 Rule 26(f) conference for the following reasons: 1) judicial economy favors forbearing on  
5 opening discovery until the court resolves Defendant DLA Piper LLP (US)'s objection to  
6 personal jurisdiction in this court; 2) numerous eye-witnesses, shareholders, officers and  
7 members of Plaintiff China Auto Logistics's board reside in China. A general ban currently  
8 exists that would prohibit travel from China to the United States. Plaintiff believes it will be  
9 extremely challenging to coordinate witness depositions until the travel ban is resolved; 3)  
10 Numerous other witnesses reside outside of Nevada and the United States. The parties believe it  
11 will be challenging to coordinate these depositions and other discovery until travel and other  
12 business restrictions that exist due to the coronavirus pandemic are lifted.

13           **It Is Therefore Stipulated and Agreed** that the time to hold the Fed. R. Civ. P. 26(f)  
14 conference is extended another sixty days to **August 31, 2020**, or until twenty (20) days  
15 following ruling by the Court on Defendants Motion to Dismiss, whichever date occurs first.

16 DATED this 30<sup>th</sup> day of June, 2020.

DATED this 30<sup>th</sup> day of June, 2020.

17 MINCIN LAW, PLLC

LIPSON NEILSON P.C.

18 By: /s/David Mincin

By: /s/ Lisa J. Zastrow

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*Attorneys for Defendant*

**ORDER**

Based on the foregoing stipulation of the parties, and good cause appearing,

**IT IS HEREBY ORDERED** that the time to hold the Fed. R. Civ. P. 26(f) conference is extended to **August 31, 2020**, or until twenty (20) days following ruling by the Court on Defendants Motion to Dismiss, whichever date occurs first.

Dated this 30<sup>th</sup> day of June, 2020.

  
United States Magistrate Judge

Prepare and submitted by:

LIPSON NEILSON P.C.

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